

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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John T. Metcalf, : ECF Case
Plaintiff, : 11-cv-03996 (AKH)
v. :
Sophocles N. Zoullas, et al., :
Defendants. :
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DECLARATION OF CAROL S. SHAHMOON

I, Carol S. Shahmoon, hereby declare as follows:

1. I am an attorney duly admitted to practice in this Court and an attorney in the law firm of Chitwood Harley Harnes LLP, at 1350 Broadway, Suite 908, New York, New York 10018, counsel for Plaintiff John T. Metcalf in his lawsuit.
2. I submit this declaration in support of Plaintiff's Motion To Join Party Plaintiffs filed with this Court contemporaneously herewith. This declaration describes the attached documents which are cited in Plaintiff's Memorandum of Law in support of the Motion.
3. Attached as Exhibit A is the Complaint in this action filed on June 13, 2011, revised to reflect the addition of the party plaintiffs that Plaintiff seeks by the Motion to join in this action (as revised, the "Modified Complaint").
4. Attached as Exhibit B is a black-lined copy of the Modified Complaint, marked to show changes from the original Complaint filed with this Court on June 13, 2011.

5. Attached as Exhibit C is a shareholder verification of the Modified Complaint pursuant to Rule 23.1 of the Federal Rules of Civil Procedure, submitted on behalf of Manny Doppelt.

6. Attached as Exhibit D is a shareholder verification of the Modified Complaint pursuant to Rule 23.1 of the Federal Rules of Civil Procedure, submitted on behalf of Lawrence Doppelt.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 5, 2011.

New York, New York

s/ Carol S. Shahmoon
Carol S. Shahmoon

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Declaration Of Carol S. Shahmoon** was filed this 5th day of October, 2011, via this Court's CM/ECF filing system, which gives electronic notice to all parties registered to receive such notice.

s/ Carol S. Shahmoon
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